

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE TRONOX, INC.,
SECURITIES LITIGATION**

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: Civil Action No. 09-cv-06220-SAS

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: **ECF CASE**

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: **Electronically Filed**

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**DECLARATION OF THOMAS C. BRIGHT IN SUPPORT OF
LEAD PLAINTIFFS' MOTION FOR CLASS CERTIFICATION AND
APPOINTMENT OF CLASS REPRESENTATIVES AND CLASS COUNSEL**

I, Thomas C. Bright, under penalty of perjury, declare as follows:

1. I have been admitted to practice in this Court *pro hac vice* for purposes of this litigation. I am an attorney at law at Gold Bennett Cera & Sidener LLP, counsel for Plaintiffs LaGrange Capital Partners, LP and LaGrange Capital Partners Offshore Fund, Ltd (“LaGrange”), the Lead Plaintiffs in this action. I submit this declaration in support of Lead Plaintiffs’ Motion for an Order, pursuant to Rules 23(a), 23(b)(3), and 23(g) of the Federal Rules of Civil Procedure for the following relief: (i) certifying the class defined as all persons and entities who purchased or otherwise acquired the securities of Tronox, Inc. during the period November 21, 2005 through January 12, 2009; (ii) appointing LaGrange, and San Antonio Fire and Police Pension Fund and Fire and Police Pension Association of Colorado (San Antonio and Colorado together are referred to as the “Named Plaintiffs”) as Class Representatives; and (iii) appointing Gold Bennett Cera & Sidener LLP (“GBCS”) as Class Counsel.

2. On October 13, 2009, this Court approved the selection of GBCS to serve as Lead Plaintiffs’ Counsel. Subsequent thereto, GBCS has vigorously litigated this case, and worked cooperatively and in conjunction with Bernstein Litowitz Berger & Grossmann LLP (“BLBG”), counsel to the Named Plaintiffs. The work performed by GBCS has included investigating and prosecuting the claims in this action on behalf of the class. Among other things, and in cooperation with BLBG, GBCS has reviewed voluminous publicly available documents concerning Tronox Incorporated (“Tronox”), as well as defendants Kerr-McGee Corporation (“KMG”) and Anadarko Petroleum Corporation (“Anadarko”); monitored the Tronox bankruptcy case and related Adversary Proceeding; interviewed a number of former Tronox, KMG, and Anadarko employees; researched and analyzed potential claims under the federal securities laws; drafted a 171- page Consolidated Class Action Complaint and a 174- page First Amended Consolidated Class Action Complaint; successfully defeated the majority of the Defendants’ multiple motions to dismiss; developed and pursued discovery requests to Defendants and third parties; responded to Defendants’ multiple discovery requests and produced LaGrange documents; continued to review and analyze millions of documents produced by the parties and various third parties; and consulted with and retained experts relating

to various aspects of this litigation. If a class is certified, GBCS, working cooperatively and in conjunction with Named Plaintiffs' counsel BLBG, will continue to vigorously represent members of the proposed class, and commit the resources necessary to such efforts.

3. As detailed in its firm resume, attached as Exhibit J, GBCS has been prosecuting complex securities class actions for over 40 years. BLBG has similar experience, as detailed in its firm resume attached as Exhibit K. GBCS, in conjunction with BLBG, will continue to prosecute this action vigorously on behalf of the class, represent the interests of the class fairly and adequately, and commit the resources necessary to resolve this case on the best terms possible for the class. GBCS will continue to assist Lead Plaintiffs, LaGrange, in fulfilling their duties to monitor and supervise this litigation.

4. True and correct copies of the following documents are attached hereto:

- Exhibit A: Declaration of Tavy Ronen, Ph.D., together with Exhibits 1-30 thereto
- Exhibit B: September 2009 Certification of Grange Johnson, Managing Member of LaGrange Capital Management, LLC, General Partner of LaGrange Capital Partners, LP and LaGrange Capital Partners Offshore Fund, Ltd.
- Exhibit C: November 20, 2009 Certification of Warren J. Schott, Executive Director and Chief Investment Officer, San Antonio Fire & Police Pension Fund
- Exhibit D: November 21, 2009 Certification of Kevin B. Lindahl, Esq., General Counsel, Fire & Police Association of Colorado
- Exhibit E: Excerpts from the Deposition of Frank LaGrange Johnson
- Exhibit F: Excerpts from the Deposition of Frank B. Burney, Esq.
- Exhibit G: Excerpts from the Deposition of Kevin B. Lindahl, Esq.
- Exhibit H: Certain documents produced by the San Antonio Fire & Police Pension Fund
- Exhibit I: Certain documents produced by the Fire & Police Association of Colorado

Exhibit J: Firm Resume of Gold Bennett Cera & Sidener LLP

Exhibit K: Firm Resume of Bernstein Litowitz Berger & Grossmann LLP

I declare under penalty of perjury that the foregoing is true and correct. Executed on
August 9, 2011.

/s/Thomas C. Bright

Thomas C. Bright

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2011, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered users.

_____/s/Solomon B. Cera

Solomon B. Cera